

Enforcement
42-045-00070



Monroe Energy, L.L.C.
4101 Post Road
Trainer, PA 19061
(610) 364-8000

October 9, 2015

Mr. James Rebarchak
Air Quality Program
Commonwealth of Pennsylvania
Department of Environmental Protection
Southeast Regional Office
2 East Main Street
Norristown, PA 19401

RE: **Monroe Energy, LLC – Trainer Refinery**
Third Quarter (3Q2015) PADEP VOC Fugitive Monitoring Report
Title V Operating Permit No. 23-00003

RECEIVED

OCT 19 2015

Dear Mr. Rebarchak:

Air Protection Division

As required by Pennsylvania Code, Title 25, §129.58(f), the Monroe Energy, LLC (Monroe Energy) Trainer Refinery hereby submits the VOC Fugitive Emissions Monitoring Report for the period July 1, 2015 thru September 30, 2015.

This report consists of the following documents:

- Compliance Monitoring Summary Pennsylvania Title 25, Section 129.58.
- Compliance Repair Delay List Pennsylvania Title 25, Section 129.58.
- Compliance Report Repair Delayed History – Components Repaired During Report Period, Pennsylvania Title 25, Section 129.58.
- Compliance Report – Components Added and Deleted During Report Period, Pennsylvania Title 25, Section 129.58.

As required by the Consent Decree H-05-0258, paragraph 236, Monroe Energy is hereby notifying the Department that the report leak rates contained herein for valves and pumps are those applicable regulatory leak definitions defined in Pennsylvania Code, Title §129.58(a).

During the reporting period, all components were monitored in accordance with Monroe Energy's Alternate LDAR Plan Monitoring Schedule and no late repairs were recorded. Also, per the aforementioned Consent Decree, all valves with a leak rate of over 10,000 ppm that required a Drill and Tap were successfully repaired to a leak rate less than 500 ppm and were not placed on Delay of Repair list.

Mr. James Rebarchak
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Subject to the penalties of Title 18 Pa. C.S. Section 4904 and 35 P.S. Section 4009 (b) (2), I certify under penalty of law that, based on information and belief formed after reasonable inquiry, the statements and information contained herein are true, accurate, and complete.

Should you have any questions or comments regarding this report, please contact Stephani Ski Szymanski, Environmental Engineer and Program Lead, at (610) 364-8073.

Sincerely,



Jeffrey K. Warmann
CEO & President

Enclosures

cc: Office of Air Enforcement & Compliance Assistance (3AP20)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029
FedEx

MONROE ENERGY TRAINER REFINERY
3Q2015 PADEP QUARTERLY LDAR REPORT
SUMMARY REPORT

REPORT DATE: OCTOBER 9, 2015

REPORT COMPLIANCE PERIOD: JULY 1 - SEPT 30, 2015

<u>Regulation</u>	<u>ComplianceGroup</u>	<u>Class</u>	<u>Month</u>	<u>Monitore</u>	<u>Leake</u>	<u>Late</u>
<u>PAREF</u>	<u>543 CRUDE</u>					
		PUMP	7	4	0	0
		PUMP	8	4	0	0
		PUMP	9	4	0	0
		RELIEF	7	22	0	0
		RELIEF	8	10	0	0
		VALVE	7	2	0	0
		VALVE	8	1,072	1	0
		VALVE	9	32	0	0
				<u>1,150</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>544 CRUDE</u>					
		PUMP	7	15	0	0
		PUMP	8	15	0	0
		PUMP	9	15	0	0
		RELIEF	7	10	0	0
		RELIEF	8	10	0	0
		VALVE	7	5	0	0
		VALVE	8	1,162	1	0
		VALVE	9	21	0	0
				<u>1,253</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>544 VACUUM</u>					
		PUMP	7	2	0	0
		PUMP	8	2	0	0
		PUMP	9	2	0	0
		RELIEF	7	9	0	0
		RELIEF	8	7	0	0
		VALVE	8	392	0	0
		VALVE	9	2	0	0
				<u>416</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>ALKY</u>					
		PUMP	7	22	0	0
		PUMP	8	21	1	0
		PUMP	9	22	0	0
		RELIEF	8	34	1	0
		RELIEF	9	8	0	0
		VALVE	7	11	0	0
		VALVE	8	2,485	2	0
		VALVE	9	47	0	0
				<u>2,650</u>	<u>4</u>	<u>0</u>

<u>PAREF</u>	<u>AMINE</u>					
		PUMP	7	1	0	0
		PUMP	8	1	0	0
		PUMP	9	1	0	0
		RELIEF	7	5	0	0
		VALVE	7	338	0	0
		VALVE	8	4	0	0
		VALVE	9	4	0	0
				<u>354</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>AWWTP</u>					
		VALVE	8	140	0	0
				<u>140</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BLEND</u>					
		PUMP	7	15	0	0
		PUMP	8	15	0	0
		PUMP	9	15	0	0
		RELIEF	7	34	0	0
		VALVE	7	1,229	0	0
		VALVE	8	1	0	0
		VALVE	9	1	0	0
				<u>1,310</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BOILER</u>					
		RELIEF	8	1	0	0
		VALVE	8	167	0	0
		VALVE	9	43	0	0
				<u>211</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BOILERS 9 & 10</u>					
		RELIEF	9	4	0	0
		VALVE	7	8	0	0
		VALVE	8	416	0	0
		VALVE	9	6	0	0
				<u>434</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>BUTANE</u>					
		RELIEF	7	2	0	0
		RELIEF	8	7	0	0
		VALVE	8	298	0	0
				<u>307</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>DESALT</u>					
		PUMP	7	10	0	0
		PUMP	8	10	0	0
		PUMP	9	10	0	0
		RELIEF	7	21	0	0
		VALVE	7	805	0	0
		VALVE	8	11	0	0
		VALVE	9	8	0	0

				<u>875</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>DIESEL</u>					
		PUMP	7	11	0	0
		PUMP	8	11	0	0
		PUMP	9	11	0	0
		RELIEF	7	15	0	0
		RELIEF	9	3	0	0
		VALVE	7	788	1	0
		VALVE	8	19	0	0
		VALVE	9	20	0	0

				<u>878</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>FCC</u>					
		PUMP	7	19	0	0
		PUMP	8	19	0	0
		PUMP	9	19	0	0
		RELIEF	7	6	0	0
		RELIEF	8	26	0	0
		VALVE	7	2	0	0
		VALVE	8	1,629	0	0
		VALVE	9	17	0	0

				<u>1,737</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>FLARE</u>					
		PUMP	7	3	0	0
		PUMP	8	3	0	0
		PUMP	9	3	0	0
		VALVE	9	206	0	0

				<u>215</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>ISOCRK</u>					
		COMPR	7	1	0	0
		COMPR	8	1	0	0
		COMPR	9	1	0	0
		PUMP	7	18	0	0
		PUMP	8	18	0	0
		PUMP	9	18	0	0
		RELIEF	7	58	1	0
		RELIEF	9	3	0	0
		VALVE	7	3,112	0	0
		VALVE	8	8	0	0
		VALVE	9	8	0	0

				<u>3,247</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>KERO</u>					
		PUMP	7	9	0	0
		PUMP	8	9	0	0
		PUMP	9	9	0	0
		RELIEF	7	32	0	0
		RELIEF	8	1	0	0

RELIEF	9	6	0	0
VALVE	7	1,514	1	0
VALVE	8	9	0	0
VALVE	9	22	0	0

1,611 1 0

PAREF LOWLN

PUMP	7	6	0	0
PUMP	8	6	0	0
PUMP	9	6	0	0
RELIEF	7	6	0	0
VALVE	7	573	0	0
VALVE	8	6	0	0
VALVE	9	8	0	0

611 0 0

PAREF MARINE

RELIEF	8	8	0	0
VALVE	8	185	0	0

193 0 0

PAREF NAPHTH

PUMP	7	16	0	0
PUMP	8	16	0	0
PUMP	9	16	0	0
RELIEF	7	4	0	0
RELIEF	8	3	0	0
RELIEF	9	13	0	0
VALVE	7	30	0	0
VALVE	8	5	1	0
VALVE	9	1,518	0	0

1,621 1 0

PAREF PLATFO

COMPR	7	1	0	0
COMPR	8	1	0	0
COMPR	9	1	0	0
PUMP	7	8	0	0
PUMP	8	8	0	0
PUMP	9	8	0	0
RELIEF	9	30	0	0
VALVE	7	17	0	0
VALVE	8	15	0	0
VALVE	9	2,167	0	0

2,256 0 0

PAREF PRORCL

PUMP	7	1	0	0
PUMP	8	1	0	0
PUMP	9	1	0	0
RELIEF	9	3	0	0

		VALVE	9	313	0	0
				<u>319</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>PROREC</u>					
		RELIEF	7	1	0	0
		RELIEF	8	12	0	0
		VALVE	7	1	0	0
		VALVE	8	643	4	0
		VALVE	9	5	0	0
				<u>662</u>	<u>4</u>	<u>0</u>
<u>PAREF</u>	<u>PROSTO</u>					
		PUMP	7	6	0	0
		PUMP	8	6	0	0
		PUMP	9	6	0	0
		RELIEF	7	20	0	0
		RELIEF	9	2	0	0
		VALVE	7	540	0	0
		VALVE	8	1	0	0
		VALVE	9	1	0	0
				<u>582</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>REFORM</u>					
		PUMP	7	8	0	0
		PUMP	8	8	0	0
		PUMP	9	8	0	0
		RELIEF	8	11	0	0
		RELIEF	9	3	0	0
		VALVE	7	1	0	0
		VALVE	8	825	0	0
		VALVE	9	19	0	0
				<u>883</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SOUR</u>					
		RELIEF	8	2	0	0
		VALVE	8	53	0	0
				<u>55</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SOUTH TANK FARM</u>					
		RELIEF	9	5	0	0
		VALVE	9	55	0	0
				<u>60</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SRU</u>					
		RELIEF	7	3	0	0
		VALVE	7	78	0	0
				<u>81</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>SUNOL</u>					
		RELIEF	9	3	0	0

		VALVE	9	192	0	0
				<u>195</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>TAIL GAS</u>					
		RELIEF	7	3	0	0
		VALVE	7	159	0	0
				<u>162</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>TF</u>					
		PUMP	7	42	0	0
		PUMP	8	41	0	0
		PUMP	9	42	0	0
		RELIEF	7	5	0	0
		RELIEF	9	101	0	0
		VALVE	7	322	0	0
		VALVE	8	19	1	0
		VALVE	9	3,550	0	0
				<u>4,122</u>	<u>1</u>	<u>0</u>
<u>PAREF</u>	<u>VACUUM</u>					
		PUMP	7	2	0	0
		PUMP	8	2	0	0
		PUMP	9	2	0	0
		RELIEF	7	3	0	0
		VALVE	7	494	0	0
		VALVE	8	1	0	0
				<u>504</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>VGO</u>					
		PUMP	7	1	0	0
		PUMP	8	1	0	0
		PUMP	9	1	0	0
		RELIEF	7	11	0	0
		VALVE	7	619	0	0
		VALVE	8	9	0	0
		VALVE	9	5	0	0
				<u>647</u>	<u>0</u>	<u>0</u>
<u>PAREF</u>	<u>WGS</u>					
		PUMP	7	4	0	0
		PUMP	8	4	0	0
		PUMP	9	4	0	0
		RELIEF	8	1	0	0
		RELIEF	9	4	0	0
		VALVE	8	8	0	0
		VALVE	9	437	0	0
				<u>462</u>	<u>0</u>	<u>0</u>
<u>Grand Total:</u>				<u>30.202</u>	<u>15</u>	<u>0</u>

MONROE ENERGY TRAINER REFINERY
 3Q2015 PADEP QUARTERLY LDAR REPORT
 ON DELAY OF REPAIR COMPONENTS
 REPORT DATE: OCTOBER 9, 2015
 REPORT COMPLIANCE PERIOD: JULY 1, 2015 - SEPT 30, 2015

TAG	CLASS	AREA	PLACED ON DELAY
06702	VALVE	3	08/27/2015

TOTAL:	1
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MONROE ENERGY TRAINER REFINERY
3Q2015 PADEP QUARTERLY LDAR REPORT
REMOVED FROM DELAY OF REPAIR
REPORT DATE: OCT 9, 2015
REPORT COMPLIANCE PERIOD: JULY 1, 2015 - SEPT 30, 2015

TAG	AREA	CLASS	PLACED ON DELAY	OFF DELAY
06702	3	VALVE	8/27/2015	8/28/2015
TOTAL OFF DELAY				1

MONROE ENERGY TRAINER REFINERY
3Q2015 PADEP QUARTERLY LDAR REPORT
REMOVED FROM DELAY OF REPAIR
REPORT DATE: OCT 9, 2015
REPORT COMPLIANCE PERIOD: JULY 1, 2015 - SEPT 30, 2015

Compliance Group	Class	Added	Deleted
543 CRUDE	PRESSURE RELIEF DEVICE	0	2
543 CRUDE	PUMP	0	0
543 CRUDE	VALVE	0	0
544 CRUDE	PRESSURE RELIEF DEVICE	0	0
544 CRUDE	PUMP	0	2
544 CRUDE	VALVE	0	0
544 VACUUM	PRESSURE RELIEF DEVICE	0	1
544 VACUUM	PUMP	0	0
544 VACUUM	VALVE	0	0
ALKY	PRESSURE RELIEF DEVICE	0	0
ALKY	PUMP	0	4
ALKY	VALVE	0	0
AMINE	PRESSURE RELIEF DEVICE	12	156
AMINE	PUMP	0	0
AMINE	VALVE	0	0
AWWTP	VALVE	5	1
BLEND	PRESSURE RELIEF DEVICE	0	0
BLEND	PUMP	0	0
BLEND	VALVE	0	0
BOILER	PRESSURE RELIEF DEVICE	0	0
BOILER	VALVE	0	0
BOILERS 9 & 10	PRESSURE RELIEF DEVICE	37	0
BOILERS 9 & 10	VALVE	0	0
BUTANE	PRESSURE RELIEF DEVICE	12	10
BUTANE	VALVE	0	0
CRUDE	PRESSURE RELIEF DEVICE	0	0
CRUDE	PUMP	0	0
CRUDE	VALVE	0	0
DESALT	PRESSURE RELIEF DEVICE	0	0
DESALT	PUMP	0	0
DESALT	VALVE	0	0
DIESEL	COMPRESSOR	11	0
DIESEL	PRESSURE RELIEF DEVICE	0	0
DIESEL	PUMP	1	0
DIESEL	VALVE	0	0
FCC	PRESSURE RELIEF DEVICE	14	5
FCC	PUMP	2	0
FCC	VALVE	0	0
FLARE	PRESSURE RELIEF DEVICE	16	0
FLARE	PUMP	0	0
FLARE	VALVE	0	0
ISOCRK	COMPRESSOR	0	0
ISOCRK	PRESSURE RELIEF DEVICE	0	0
ISOCRK	PUMP	0	0
ISOCRK	VALVE	0	0
KERO	COMPRESSOR	0	0
KERO	PRESSURE RELIEF DEVICE	0	0
KERO	PUMP	0	0
KERO	VALVE	0	0
		18	0

LOWLN	COMPRESSOR	0	0
LOWLN	PRESSURE RELIEF DEVICE	0	0
LOWLN	PUMP	0	0
LOWLN	VALVE	7	0
MARINE	COMPRESSOR	0	0
MARINE	PRESSURE RELIEF DEVICE	0	0
MARINE	PUMP	0	0
MARINE	VALVE	0	0
NAPHTH	COMPRESSOR	0	0
NAPHTH	PRESSURE RELIEF DEVICE	0	0
NAPHTH	PUMP	0	0
NAPHTH	VALVE	3	7
OYF	VALVE	0	0
PLATFO	COMPRESSOR	0	0
PLATFO	PRESSURE RELIEF DEVICE	0	0
PLATFO	PUMP	0	0
PLATFO	VALVE	0	7
PRORCL	PRESSURE RELIEF DEVICE	0	0
PRORCL	PUMP	0	0
PRORCL	VALVE	0	0
PROREC	PRESSURE RELIEF DEVICE	0	0
PROREC	VALVE	1	1
PROSTO	PRESSURE RELIEF DEVICE	0	0
PROSTO	PUMP	0	0
PROSTO	VALVE	0	0
REFORM	PRESSURE RELIEF DEVICE	0	0
REFORM	PUMP	0	0
REFORM	VALVE	0	0
SOUR	PRESSURE RELIEF DEVICE	0	0
SOUR	PUMP	0	0
SOUR	VALVE	0	0
SOUTH TANK FARM	PRESSURE RELIEF DEVICE	0	0
SOUTH TANK FARM	VALVE	0	0
SRU	COMPRESSOR	0	0
SRU	PRESSURE RELIEF DEVICE	0	0
SRU	VALVE	0	0
SUNOL	COMPRESSOR	0	0
SUNOL	PRESSURE RELIEF DEVICE	0	0
SUNOL	PUMP	0	0
SUNOL	VALVE	0	0
TAIL GAS	PRESSURE RELIEF DEVICE	0	0
TAIL GAS	VALVE	0	0
TF	COMPRESSOR	0	0
TF	PRESSURE RELIEF DEVICE	0	0
TF	PUMP	0	0
TF	VALVE	15	0
VACUUM	PRESSURE RELIEF DEVICE	0	0
VACUUM	PUMP	0	0
VACUUM	VALVE	0	0
VGO	COMPRESSOR	0	0
VGO	PRESSURE RELIEF DEVICE	0	0
VGO	PUMP	0	0
VGO	VALVE	6	0
WGS	COMPRESSOR	0	0
WGS	PRESSURE RELIEF DEVICE	0	0
WGS	PUMP	0	0
WGS	VALVE	0	0
TOTAL:		160	196